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*Attorney for Defendants*  
THUNDER PROPERTIES, INC.  
AND LVDG, LLC [SERIES 1101]

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

2 BANK OF AMERICA, N.A., SUCCESSOR )  
3 BY MERGER TO BAC HOME LOANS )  
4 SERVICING, LP, F/K/A COUNTRYWIDE )  
5 HOME LOANS SERVICING LP, )  
6 Plaintiff, )  
7 vs. )  
8 SOUTHWEST MEADOWS; LVDG LLC )  
9 A/K/A LVDG LLC SERIES 1101; THUNDER )  
10 PROPERTIES, INC.; ALESSI & KOENIG, )  
11 LLC, )  
12 Defendants. )  
13 \_\_\_\_\_ )  
14 Case No. 3:16-cv-00183-MMD-VPC

**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO**  
**MOTION FOR PARTIAL SUMMARY JUDGMENT**  
**(First Request)**

23 COMES NOW Plaintiff, BANK OF AMERICA, N.A. ("BANA"), and Defendants,  
24 THUNDER PROPERTIES, INC. ("Thunder") and LVDG, LLC [SERIES 1101] ("LVDG"), by  
25 and through their undersigned counsel, and hereby stipulate and agree as follows:

26 1. On January 29, 2019, BANA filed and served its Motion for Partial Summary  
27 Judgment [ECF No. 72] (“*Motion*”).  
28 2. Pursuant to the Federal Rules of Civil Procedure, an opposition to the Motion is

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1 presently due from Thunder and LVDG on or before February 19, 2019.

2 3. As a result of numerous other pending work and personal obligations, including a  
3 Reply Brief due on February 19, 2019 in an unrelated Nevada Supreme Court  
4 matter, LVDG and Thunder's counsel has requested and extension of time in  
5 which to file its Opposition to the Motion.  
6 4. LVDG and Thunder shall be granted an extension of time in which to file its  
7 Opposition to the Motion until March 8, 2019.  
8 5. BANA shall be granted an extension of time in which to file any reply, up to and  
9 including March 21, 2019.  
10 6. This Stipulation is made in good faith and not for purpose of delay.

11 Dated this 19<sup>th</sup> day of February, 2019.

12 ROGER P. CROTEAU &  
13 ASSOCIATES, LTD.

AKERMAN, LLP

14 /s/ *Timothy Rhoda*  
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AND LVDG, LLC [SERIES 1101]

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Attorney for Plaintiff  
Bank of America, N.A.

20 IT IS SO ORDERED.  
21

22 By:

23 Judge, U.S. District Court

24 Dated: February 19, 2019